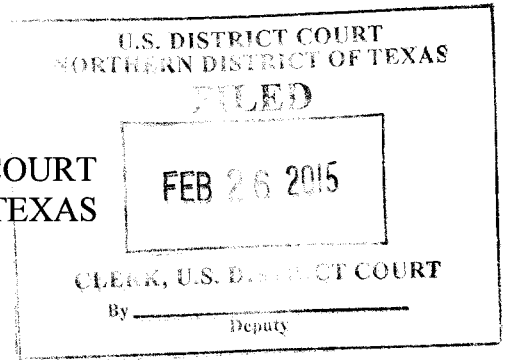


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:15-MJ - 067

JOSE GUADALUPE JUAREZ (01)
a.k.a. Jose Guadalupe Juarez-Zarate

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or before July 28, 2014, in the Northern District of Texas and elsewhere, the defendant, **Jose Guadalupe Juarez**, did attempt to file in a public record with the Business and Commercial Services Division of the Arkansas Secretary of State, a false lien and encumbrance against the real and personal property of an officer and employee of the United States Government described in 18 U.S.C. § 1114, to wit, a United States District Judge, on account of the performance of official duties by that individual, knowing and having reason to know that such lien and encumbrance was false and contained materially false, fictitious, and fraudulent statements and representations. In violation of 18 U.S.C. § 1521.

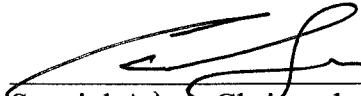
I, Christopher Smith, further state that I am a Special Agent with the FBI assigned to the Dallas Division, and that this Complaint is based upon the following facts:

1. I have been employed as a Special Agent with the FBI for approximately 4 years. The information contained in this complaint is from my personal knowledge of this investigation, and from others as reported to me.
2. On or about February 17, 2012, in the Southern District of Texas, **Jose Guadalupe Juarez** pled guilty to a violation of 18 U.S.C. §§ 2 and 841(a)(1) and (b)(1)(B). As a result of the conviction, **Juarez** was sentenced to a term of 48 months, which was to be served in a Bureau of Prisons Federal Correctional Institution (FCI). **Juarez** was thereafter incarcerated in a Federal Correctional Institution, and between at least the beginning of February 2014 and September 2014, **Juarez** was incarcerated at FCI Fort Worth.

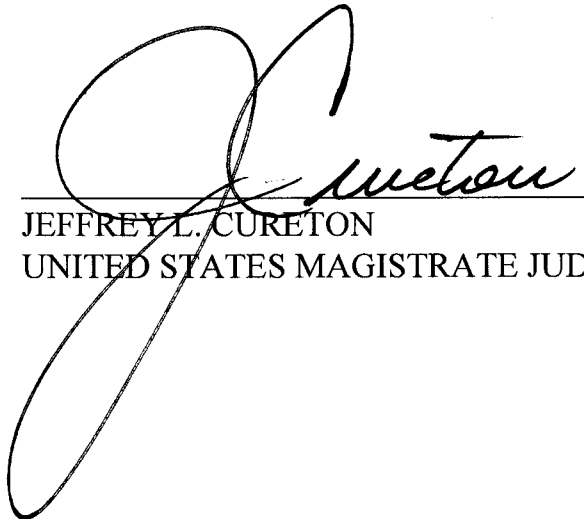
3. Beginning in February 2014 and continuing through July 29, 2014, **Juarez** and others at FCI Fort Worth began conducting research into the manner and methods by which to file an encumbrance, and notice of encumbrance, against the real and personal property of individuals. Upon learning the method and manner in which to do so, **Juarez** and others obtained the necessary paperwork by which to file a UCC-1 Financing Statement and Common Law Lien with the Business and Commercial Services Division of the Arkansas Secretary of State.
4. Thereafter, **Juarez** directed others to complete a UCC-1 Financing Statement and Common Law Lien. **Juarez** directed these individuals to list **Juarez** as the secured party, and the United States District Judge "Judge", who presided over his August 2012 conviction, as one of the debtors.
5. Upon the completion of the UCC-1 Financing Statement and Common Law Lien, **Juarez** reviewed the documents and mailed them to M.L. in Laredo, Texas. **Juarez** additionally directed M.L. to mail the documents to the Business and Commercial Services Division of the Arkansas Secretary of State for filing.
6. On or about July 28, 2014, the Business and Commercial Services Division of the Arkansas Secretary of State received the UCC-1 Financing Statement and Common Law Lien, which listed **Juarez** as the secured party and the Judge as one of the debtors. Both the UCC-1 Financing Statement and the Common Law Lien were recorded by the Business and Commercial Services Division of the Arkansas Secretary of State upon receipt. The Business and Commercial Services Division of the Arkansas Secretary of State is a public record.
7. On February 11, 2015, **Juarez** was interviewed at the Federal Medical Center in Lexington, Kentucky by FBI agents regarding the UCC-1 Financing Statement and Common Law Lien. **Juarez** was advised of his Miranda rights and agreed to speak with the interviewing agents. **Juarez** acknowledged that he completed the UCC-1 Financing Statement and the Common Law Lien, mailed them to M.L., and instructed M.L. to file the documents.
8. **Juarez** advised that he filed the UCC-1 Financing Statement and Common Law Lien in order to prevent his deportation. **Juarez** has performed no services for the Judge, exchanged no titles, or otherwise performed any duties or engaged in any transactions which might result in the Judge being indebted to **Juarez**. As such, information contained in the UCC Financing Statement and Common Law Lien listing **Juarez** as a secured party and the Judge as a debtor is false.

9. Based upon the aforementioned facts, I believe that on or before about July 28, 2014, in the Northern District of Texas and elsewhere, **Jose Guadalupe Juarez** committed the offense of Retaliating Against a Federal Judge by False Claim of Slander of Title, a violation of 18 U.S.C. § 1521.

2/26/15
Date


Special Agent Christopher Smith
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, 26th day of February, 2015, at 3:14 a.m. p.m. in Fort Worth, Texas.


JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE